## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)
	)
vs.	) NO. 04-30021 MAP
	)
BLADIMER HERRRARA	)
aka LUIS RAMOS	)

## **MOTION TO CONTINUE**

Now comes Luis Ramos, the defendant in the above entitled action, and moves this Honorable Court for a Continuance of the Sentencing presently scheduled for May 13, 2008 and as his basis, therefore, the following;

At present counsel as he has a scheduling conflict as he has a Sentencing scheduled in the matter of United States v Samuels Docket NO. 05-10235 before Judge O'Toole in the United States District Court in Boston at 2:00 p.m. on May 13, 2008.

Counsel received a corrected Presentence Report prepared on May 6, 2008 and does not anticipate filing any objections to this report. As of the filing of this motion counsel has been unable to review the corrected report with Mr. Herrara

WHEREFORE, counsel for the defendant requests Sentencing in this matter be continued to any other date during the month of May convenient to this court.

Respectfully submitted, THE DEFENDANT

BY: /s/ Vincent A. Bongiorni, Esq. 95 State Street, Ste 309 Springfield, MA. 01103 (413) 732-0222 BBO #049040

## CERTIFICATE OF SERVICE

I, Vincent A. Bongiorni, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to the Assistant United States Attorney, Todd Newhouse, Esq., United States District Court, 1550 Main Street, Springfield, MA. 01103 this 9 day of May 2008.

/s/ Vincent A. Bongiorni